

Ernest Berger : No. 17735 Equity
vs. : In the Circuit Court for
David S. Berger and :
Henry M. Berger : Frederick County, Maryland
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TO THE HONORABLE JUDGES OF SAID COURT:

Your Orator, Ernest Berger, trustee of David S. Berger and Henry W. Berger, infants, by Manuel M. Weinberg, his Solicitor, complaining, says:

FIRST: That your Orator, by his voluntary act, did enter into a trust agreement on the 18th day of November, 1948, wherein his real estate, situated on the West side of College Avenue, in Frederick City, Maryland, being lot No. 22 and the Southern half of lot No. 21, with the improvements thereon, together with certain personal property also mentioned in said trust agreement, a copy of which is filed herewith and prayed to be made a part hereof, was placed in trust for his infant sons, the above named Defendants, in order to insure for them a place of abode and dwelling.

SECOND: That said trust agreement further placed in trust the proceeds of a certain twenty-payment life insurance policy on the life of your Orator, in order to further protect and promote the future welfare of his sons, the Defendants.

THIRD: That the said infant Defendants mentioned herein are aged 18 and 16 years, respectively.

FOURTH: That, according to the terms of the trust thereby created, no power of sale was reserved in the trustee, and the trust agreement further provided that the trust should continue until the 1st day of January, 1960, at which time it would be terminated and the property would be conveyed in fee simple unto the cestui que trust, as mentioned above, in equal shares.

FIFTH: That your Orator has recently entered into a contract of purchase of a tract of land located in Tuscarora